

BEFORE THE POSTAL RATE COMMISSION
WASHINGTON, DC 20268

In the matter of:

Holman Post Office, New Mexico, 87723

Docket Number 1367246-87723901

PRC Docket A-2012-18

Holman Community, Petitioner

PARTICIPANT STATEMENT

1. Petitioners are appealing the Postal Service's Final Determination concerning the Holman Post Office. The Final Determination was posted on September 26, 2011.
2. In accordance with applicable law, 39 U.S.C. 404(d)(5), the Petitioner requests the Postal Regulatory Commission to review the Postal Service's determination on the basis of the record before the Postal Service in the making of the determination.
3. Petitioners: Please set out below the reasons why you believe the Postal Service's Final Determination should be reversed and returned to the Postal Service for further consideration. (See pages of the Instructions for an outline of the kinds of reasons the law requires us to consider.)

BELOW IS THE STATEMENT OF THE HOLMAN COMMUNITY

Form 61 Supplemental Data
Community of Holman Appeal

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Dear Sirs,

We request that the Postal Regulatory Commission remand our case to the Postal Service for further considerations and a lot more study of the effects of this proposed closure on our community and service.

Summary of Post Office failures to correctly follow process:

1. Ignoring regulations that specified that the absence of a post master was not a reason to close an office. (March 2011, regulations not changed till August)
2. Inadequate and incorrect research on the community of Holman – the population information alone was wrong by a factor of 10. Actual population is about 400, not 3,438.
3. No assessment of effects on a community within a Federally Designated Enterprise Zone, with a high percentage of seniors, high unemployment and low average income – a Distressed area!

4. The Post office could not possibly accurately assess community impact of closure based on totally incorrect information
5. No strategic plan for service – just want to close all post offices in Mora Valley regardless of how well or poorly situated they might be.
6. No fulfillment of promises made, and recorded, to examine the possibility of a part time post office or a village post office for Holman.
7. Closing Holman and other offices for political, not economic reasons while failing to reorganize whole operation through a recognized process such as Chapter 11 bankruptcy.

Initial Criteria for Selection Invalid

Under the rules in force at the time the closure consideration process was started for Holman, the absence of a postmaster could not be used as the sole criteria for closing a post office. In the case of Holman this was the sole criterion, and this was stated clearly by the post office delegate to the first Holman meeting, Ms. Alberta Ellis, acting POOM of the district at the time, and we have these statements on tape. In fact the Post office has these statements on tape!!!

Alternatives were not considered

Other viable alternatives were not even considered. It is clear to us that the process was a pro-forma exercise and not a realistic evaluation. In the determination document, at response to concern #89, a half time Post Office **was suggested as an option by the postal service**. This is not addressed in the final report at all. In the same response, a village Post Office was suggested with no actual feasibility study conducted. We demand that this matter be remanded so the Postal Service can fulfill the promises made by its representatives to this community, to explore alternative resolutions. A half time post office would be expected to generate a positive revenue vs cost ratio, especially with the closing of Chacon Post Office. The community is very much in favor of this option- if it makes a profit why would the USPS not be interested in it? The representatives claim that service is their overriding concern – but they do not wish to look at an arrangement which would generate a small profit and keep the community content!!! So, in fact their words are untrue, and their motive is simply to close Holman post office regardless. We find this to be unacceptable – enough of government, and quasi-governmental lies already. A part time post office is a win- win proposal, and we demand that the Post Office do the math, and much more comprehensive math at that, than their silly 4 line simplistic (non) justification of postmaster salary minus yearly profit plus annual carrier fee.. We do not see any adding in of the upfront costs of putting in cluster box units, removal and storage of the post office building, or other costs which will be incurred.

Community Impact Assessment Erroneous

The responses to our concerns reveal a lack of understanding of, or interest in, our local situation. All decisions are being made in Washington, by people who live, work and interact within an urban

environment, where alternatives to just about everything exist in abundance and are geographically close.

The Mora Valley is a **Federally Designated Enterprise Zone**, officially a Distressed Area, and has a disproportionate number of senior citizens. Holman is within the Mora Valley and demographically typical. The Mora Valley is a rather isolated mountain valley, with several villages along one road, NM 518. Infrastructure is very expensive to put in, and to repair or replace. Despite the best efforts of the local Telephone Cooperative, internet service goes down frequently, and takes a while to get back up. Local cellphone service is likewise precarious, and goes down frequently.

Holman has quite a high percentage of seniors over 65 years old, and not more than a quarter of these households has internet, or even a computer. These senior citizens most certainly do not have the skills or financial resources to buy from “Stamps On Line”. Most will buy two or three stamps at a time – not a sheet of 10 or 20 as the carrier and USPS expect that they should. Stamps are expensive, and these seniors are mostly entirely on Social Security and surviving month to month.

Very many of the senior citizens speak Spanish as their first language, and a smaller percentage have problems with reading and writing in English. Even those who are on the route come to the Holman Post office to get help with money orders and other business. There is no way they are going to be able to do such business via the carrier – and lacking mobility it will be a struggle for them to get to other post offices. Many ride the senior bus to the senior center for lunch – that bus does not stop along the way for its seniors to visit the post office.

The Holman Post office is a place where a lonely senior can hang out and visit in a warm protected place with other customers. One gentleman was widowed over a year ago, and spends a lot of time at the Holman Post office for company and news. He has a computer, but it has not worked in many months, and his eyesight is failing. He is lonely, and he can stay in the lobby and chat to everyone who comes in.

The Holman Post Office acts as a community center, with notice boards informing the community of local happenings. Community concerns were addressed very dismissively. (#6, 59, 68, & 79)

These dismissive suggestions for community center concerns show no knowledge of or interest in community dynamics. For example, the Post Office suggested using a bulletin board at the normally locked, unmanned CHET volunteer fire department building 3 miles away in Cleveland. The Holman elementary school was also mentioned – this in fact houses the Head Start program, and does not welcome visitors for safety reasons, as the school houses very young children.

It is clear that the post office did not do any realistic on-site data gathering or analysis. Demographic data was taken from a web page *Sperlings BestPlaces*, and is grossly inaccurate. Population is wrong, by a factor of more than **ten**. Location data is taken from Google Maps which is not accurate. The Post Office location shown there is greater than a quarter mile wrong and the “Post Office” shown is a long abandoned adobe. The perfunctory review somehow just accepted that 3,450 people were happily being served by 156 PO Boxes and no home delivery.

There are 18 businesses listed. No effort was made to reconcile questionnaire's "no businesses" to this list. Actually, although there are no storefronts, there are several businesses which heavily rely on the Post Office.

Example: Agua Negra Water District ONLY accepts payments via mail. No credit cards and no face to face transactions. Some customers have to use postal money orders.

Example: Karen's Books does ALL shipping and most receiving through the Holman Post Office.

Example: Freedom Machine depends on the security of an attended Post Office for receipt of high value parts.

Example: Fedex and UPS frequently leave packages at the Holman post office, since some customers live up the mountain on long dirt roads that get very rugged in winter. Such customers might only come down to Holman every two or three weeks, and the OIC knows this and just holds their mail, instead of doing what the carrier would do and returning it to the sender.

Driving distances cited in the report are inconsistent.

Based on an average of 56 window transactions per day and based on an optimistic assumption that even half of those are completed by someone leaving cash in their CBU, this still leaves 28 transactions at the most likely alternative Post Office which is Mora. Even if half of those had other business in Mora, that leaves 14 extra trips to Mora! 14 trips times 12 miles round trip times \$0.50 (IRS mileage rate) equals **\$84 per day** from Holman residents, who live in a **Federally Designated Enterprise Zone**.

This does not consider any of the environmental impact of all those extra trips, which, according to PRC Rural Service Report, Section VIII, is significant.

Holman vs. Cleveland

Cleveland is not a realistic alternative. With closures in Holman, Watrous, Rainsville and Chacon already scheduled, no-one will want to move their address to Cleveland because no one has confidence that it isn't next on the list. Indeed, if this slash and burn policy was being conducted in a rational manner, Cleveland probably would have been the most vulnerable.

Holman is situated near the intersection of highway 518 (Las Vegas to Taos) and highway 121 (Holman to Chacon). Holman is well placed to take a percentage of business from the soon to be closed Chacon post office, as residents of Chacon MUST go through Holman to go anywhere.

Holman is six miles from Mora PO, Cleveland is only two miles from Mora.

The Cleveland and Holman post offices are laid out very similarly, and so is the parking in front of the building. The Cleveland parking lot is however much smaller, which is awkward for bigger vehicles, and exits directly onto 518 with no driveway to take a look at oncoming traffic. Holman post office has a

much larger lot, with a longer driveway where vehicles can wait to turn into traffic on 518, which is a busy, fast road.

USPS needs a different approach.

Postmaster General Donohue needs to try something different, since the current situation is very unsatisfactory and will not yield enough savings to be more than a drop in the bucket against the demands of Congress to pay all retiree costs upfront.

Mr. Donohue needs to stop begging from, and whining to, Congress, man up and simply put the USPS into Chapter 11 bankruptcy. A judge can then cut through all the union contracts that have the USPS tied in knots, sanction all sorts of re-arrangements, and then the USPS can get more sensible and less slash and burn about the rural post offices. The American taxpayers could get a break, the postal customers could get a break, and Congress might actually be moved to do something sensible for a change.

As Americans we are absolutely fed up with the federal government and its mis-management of absolutely everything in America – taking enormous amounts of money to create ever more expensive problems, and treating the common people with absolute contempt. Banking, housing, warmongering, energy policy – the Federal government does everything in the stupidest, greediest, most unproductive manner possible. The postal service retirement payment is being used to garner union support in the next election by a cynical and contemptuous Democrat party, and we the people have to pay the consequences. Let them run on their merits!!!

Please address all correspondence to:

Community of Holman
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